

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

THE STATE OF WASHINGTON,)
)
)
Plaintiff,)
)
vs.) No. 3:17-cv-05806-RJB
)
THE GEO GROUP, INC.,)
)
)
Defendant.)

DEPOSITION UPON ORAL EXAMINATION
OF
LEONARDO JARAMILLO

1:36 p.m.
June 18, 2019

OFFICE OF THE ATTORNEY GENERAL
7141 Cleanwater Drive
Olympia, Washington 98504-0113



REPORTED BY: JACQUELINE L. BELLOWS, CCR 2297



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I N D E X

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Ms. Baker -----	4
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EXHIBITS FOR IDENTIFICATION	PAGE
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Exhibit 1 Geo World, First Quarter 2017	36
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LEONARDO JARAMILLO; June 18, 2019

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1 Tumwater, Washington; June 18, 2019

2 1:36 p.m.

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4
5 LEONARDO JARAMILLO,

6 sworn as a witness by the certified court reporter,

7 testified as follows:

8
9 E X A M I N A T I O N

10 BY MS. BAKER:

11 Q. Good afternoon, Mr. Jarmillo.

12 A. Good afternoon.

13 Q. As you know, my name is LaRond Baker. I'm an
14 assistant general in the Civil Rights Division of the
15 Attorney General's Office representing Washington in the
16 lawsuit challenging Geo's practice of paying detainee
17 workers a dollar a day for work that they perform in the
18 Voluntary Work Program. Would you please state your
19 full name and work address for the record.

20 A. My work address? I have to pull this out to
21 give you the right address. Leonardo Jarmillo. I work
22 at the Mason County Juvenile Detention Center in
23 Shelton.

24 Q. We don't need the exact address. I think
25 that's good.



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1 couldn't.

2 Q. Could a detainee worker just skip a day or two
3 of work if they didn't want to work?

4 A. If they felt sick, you can tell the officer I
5 don't feel good today.

6 Q. If they didn't feel like working, could they
7 just not work for four days in a row and then come back
8 to their position?

9 A. If they didn't work for X amount of days,
10 it's -- they would probably get the opportunity: If you
11 want to work, you want to work; if you don't, let me
12 know because I'll get somebody else that does what
13 you're supposed to be doing.

14 Q. So they were expected to do their job every
15 day?

16 A. Yes. If they volunteered, that's the
17 position. That was a position that they acquired
18 through their voluntary program. They were . . .

19 Q. I've handed you a document that was previously
20 marked 103. Are you familiar with this document?

21 A. Yes.

22 Q. Can you tell me what it is?

23 A. It's a Refusal to Work.

24 Q. When would you use this document?

25 A. When a detainee that already had a job didn't



1 want to do it anymore.

2 Q. This is -- if a detainee wants to quit their
3 job, this is what they would fill out?

4 A. Correct.

5 Q. If a detainee quit a job or signed a Refusal
6 Work form, would that impact their ability to get
7 another position in the Voluntary Work Program?

8 A. They'd have to start -- it was the same
9 procedure as it was in the beginning: Submit a request
10 to the classification officer of wanting to work
11 somewhere else. And it would be their decision, not
12 mine.

13 Q. The classification officer, that's a Geo
14 officer; is that right?

15 A. Yes.

16 Q. Did ICE have any involvement in assigning
17 detainee workers to positions in the Voluntary Work
18 Program?

19 A. No.

20 Q. Did ICE have any input in terminating a
21 detainee from the Voluntary Work Program if their work
22 wasn't up to par?

23 A. No.

24 Q. Do you know how positions were created in the
25 Voluntary Work Program?



1 Q. So anyone that encourages detainees to stop
2 working could be subject to sanctions; is that right?

3 A. Yes.

4 Q. Why would that be a rule Geo has?

5 A. Because you incite others to do something
6 that's -- could get bigger.

7 Q. What do you mean by "get"?

8 A. Well, turn into a riot. So it's -- if I
9 don't -- if I have an issue with ICE, then I'm going to
10 make everybody have the same issue as me. I'm going to
11 encourage everybody to join my problem. So it's just
12 encouraging other people, other detainees: Don't work,
13 don't do this, don't do this, don't do this.

14 Q. Was there ever a work stoppage in the facility
15 when you were working there?

16 A. Yes.

17 Q. Can you tell me about that?

18 A. I can't tell you when. But the detainees
19 refused to work in the kitchen.

20 Q. What happened?

21 A. They just refused to work in the kitchen.

22 Q. Was there an impact on the facility from their
23 refusal to work?

24 A. No, because we asked other detainees if they
25 wanted to work that didn't want to participate in this



1 issue. And if they want to work, they'll come out and
2 work. It didn't matter what other detainees did. If we
3 didn't get anybody, then we would make sure the
4 detainees got fed.

5 Q. Right. So that means that Geo workers would
6 have to work in the kitchen to make the food?

7 A. Yes, ma'am.

8 Q. Do you recall an incident where that occurred,
9 where Geo workers had to make the food because detainee
10 workers had stopped working in the kitchen?

11 A. We had one. I can't tell you when.

12 Q. Do you recall whether or not food was delayed
13 in getting out to the detainees?

14 A. No.

15 Q. Do you recall whether or not there was
16 overtime that was incurred from the Geo workers?

17 A. No.

18 Q. Do you know whether or not any -- to your
19 knowledge, were you -- did you participate in any
20 detainee being subject to discipline under this 214 for
21 encouraging people to participate in a work stoppage?

22 A. No.

23 Q. Did you have any role in training detainee
24 workers to do their -- to perform their work in the
25 Voluntary Work Program?



1 Program?

2 A. Warden, associate warden. (Shakes head.) It
3 would have to be upper management.

4 Q. Do you know anything about the process by
5 which they would make the determination about the scope
6 of work for detainees in the Voluntary Work Program?

7 A. No.

8 Q. Do you know who decides how many positions are
9 available in the Voluntary Work Program?

10 A. No.

11 Q. Do you know whether the number of Voluntary
12 Work Program positions have changed during the history
13 of the Northwest Detention Center?

14 A. No.

15 Q. We've talked about this a little bit before.
16 Who supervises detainee workers in the Voluntary Work
17 Program?

18 A. Staff. Officers.

19 Q. So Geo officers?

20 A. Yes, ma'am.

21 Q. Is supervising detainee workers an integral
22 part of a Geo officer's position?

23 A. Because it's direct supervision, yes.

24 Q. Can you tell me what that means?

25 A. Direct supervision is being directly involved



1 with the detainees. In other words, you have been to
2 some facilities where there's supervision of the
3 detainees. They are in the outside of the unit, looking
4 in. With Northwest, it's direct supervision means we're
5 inside with the detainees, not outside. We're always in
6 the unit with the detainees.

7 Q. The officers are inside of the living unit
8 with noting separating them from the detainees?

9 A. Correct.

10 Q. So they're supervising all of the detainees
11 for safety?

12 A. Safety and security; yes, ma'am.

13 Q. But when -- how do they supervise the detainee
14 workers? What are their obligations or roles and
15 responsibilities related to detainee workers inside of
16 the pod?

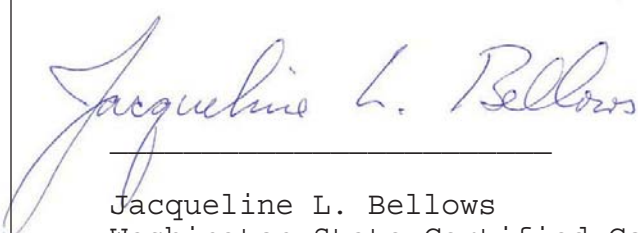
17 A. Well, because the position, the work that has
18 to be involved is that officers -- detainees in that
19 unit. So if I have painters, I have to make sure that
20 nobody is gathered around them to take something off the
21 cart. Tape was good. I always kept the tape. I'd give
22 them the tape. But I'd monitor them as well as monitor
23 everybody else. I would not -- I don't supervise from
24 my desk. I'm with the detainees. I'm at the top tier,
25 looking down; bottom tier, looking up. So I'm never in



REPORTER'S CERTIFICATE

I, JACQUELINE L. BELLOWS, the undersigned
Certified Court Reporter pursuant to RCW 5.28.010 authorized
to administer oaths and affirmations in and for the State of
Washington, do hereby certify that the sworn testimony
and/or proceedings, a transcript of which is attached, was
given before me at the time and place stated therein; that
any and/or all witness(es) were duly sworn to testify to the
truth; that the sworn testimony and/or proceedings were by
me stenographically recorded and transcribed under my
supervision, to the best of my ability; that the foregoing
transcript contains a full, true, and accurate record of all
the sworn testimony and/or proceedings given and occurring
at the time and place stated in the transcript; that a
review of which was requested; that I am in no way related
to any party to the matter, nor to any counsel, nor do I
have any financial interest in the event of the cause.

WITNESS MY HAND AND DIGITAL SIGNATURE this
22nd day of June, 2019.



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